

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

800 ADEPT, INC.,

Plaintiff,

vs.

ENTERPRISE RENT-A-CAR COMPANY,
ET AL

Defendants.

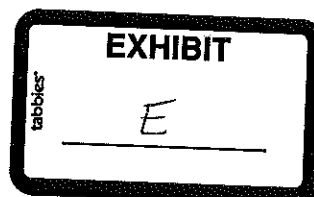
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Civil Action No. 5:07cv57

**NOTICE OF INTENTION TO TAKE
DEPOSITION DUCES TECUM OF TARGUS INFORMATION CORPORATION**

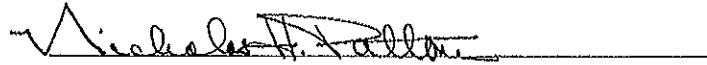
Please take notice that at **9:30 a.m. on December 17, 2007** the deposition of Targus Information Corporation will be taken pursuant to the Federal Rules of Civil Procedure and notice of counsel. Said deposition will be conducted at the offices of Esquire Deposition Services, 402 W. Broadway, #700, San Diego, CA 92101-3505, before a court reporter and officer authorized by law to administer oath. Said deposition is for the purpose of discovery and for use as evidence in the above-styled and numbered cause. The deposition may be, at the election of Plaintiff's counsel, videotaped. You are invited to attend and cross-examine.

Please take further notice that pursuant to the Federal Rules of Civil Procedure, said deponent is hereby directed to produce at **10:00 a.m. on December 10, 2007** at the offices of Esquire Deposition Services, 402 W. Broadway, #700, San Diego, CA 92101-3505, or at another agreed upon location, and to permit the inspection and copying of, any and all documents which reflect, mention, relate, or pertain to the matters that are described herein, including but not



limited to, those items more particularly described in the Exhibit A attached hereto and incorporated herein by reference.

Respectfully submitted,



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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served on opposing counsel below via electronic service this 26th day of November, 2007.

1. David Bahler, Christopher Wayne Spence, and Mark T. Garrett, FULBRIGHT & JAWORSKI, 600 Congress, Suite 2400, Austin, Texas 78701;
2. Jeff Barron, Donald Knebel and Todd Vare, BARNES & THORNBURG, 1313 Merchants Bank Bldg, 11 South Meridian Street, Indianapolis, IN 46204;
3. Damon Young and John Pickett, YOUNG, PICKETT & LEE, P.O. Box 1897, Texarkana, TX 75504-1897;
4. Natasha Moffitt and Steve Schaetzel, KING & SPALDING, 1180 Peachtree Street, Atlanta, Georgia 30309;
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6. Brett Cooper and Elizabeth Weiswasser, WEIL, GOTSHAL & MANGES, 767 Fifth Avenue, New York, NY 10153-0119;
7. Thomas King, WEIL, GOTSHAL & MANGES, Silicon Valley, 201 Redwood Shores Parkway, Redwood Shores, CA 94065;
8. Eric Buether, GREENBERG TRAURIG, 2200 Ross Avenue, Suite 5250, Dallas, Texas 75201; and
9. Gerald Fellows and Kimberly A. Warshawsky, GREENBERG TRAURIG, 2375 East Camelback Road, Suite 700, Phoenix, AZ 85016.

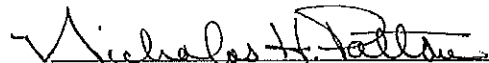

Nicholas H. Patton

EXHIBIT A

DOCUMENT REQUESTS

1. Source code, in digital format, for Targus OnDemand Telepass and OnDemand LocationID ("OnDemand products").
2. All comments to the source code for OnDemand products sufficient to trace any changes made to other Targus software or to previous versions of OnDemand software that resulted in the current versions of the source code for OnDemand products.
3. A text file or files sufficient to read and understand the precise algorithms used in the OnDemand products.
4. Databases used in the development or implementation of the OnDemand products, including documents sufficient to show what algorithms or processes are or were used in the creation of such databases.
5. Documents sufficient to show how Targus translates ZIP+4 to V-H coordinates.
6. Documents sufficient to show what algorithms or processes are or were used in the development and implementation of the ZIP+4 to V-H coordinate table used in conjunction with the OnDemand products.
7. Documents sufficient to show what algorithms or processes are or were used by Targus in assigning V-H coordinates to the geographic location of callers.
8. Documents sufficient to show what algorithms or processes are or were used by Targus in associating client locations with V-H coordinates.
9. Documents sufficient to identify what information is provided to your customers who receive OnDemand LocationID.

10. Documents showing the project and development history of the OnDemand products (including systems and algorithms used in the development or implementation of the OnDemand products), including but not limited to:

- a. Meeting notes or e-mail regarding meetings (including strategy meetings figuring out what infringement claims needed to be got around and how you proposed to get around them)
- b. Project schedules
- c. Requirements documents and e-mail concerning the same
- d. RFC's (Requests for change)
- e. Software design documents and e-mail concerning the same including but not limited to: software architecture, software module descriptions, databases and their schema, and algorithm descriptions.
- f. Hardware design documents and e-mail concerning the same including but not limited to: hardware architecture, system description documents.
- g. Network design documents and e-mail concerning the same, including but not limited to: data communications networking and voice communications networking including architectures, systems, interfaces, protocols and message sets for each type of networking.
- h. System test documentation including but not limited to: system test plans, system test procedures, and system test results.
- i. All regression testing requirements and results.
- j. E-mail providing the above information where such e-mail is the means of disseminating such information.

11. An example of OnDemand Telepass and example of OnDemand LocationID as actually implemented in a client application including but not limited to:

- a. Call flows
- b. Any software, in digital form, modified from Item 1 for that particular client
- c. All data files required to run the software for the client such as system parameter files, system configuration files, client specific databases and database data, and other input data files
- d. Actual call records sufficient to determine the accuracy of the assignments.

EXHIBIT B

DEPOSITION TOPICS

1. Development and implementation of Targus OnDemand Telepass and OnDemand LocationID ("OnDemand products") including software and hardware design.
2. Any changes made to other Targus software or to previous versions of OnDemand software that resulted in the current versions of the source code for OnDemand products.
3. The algorithms used in the OnDemand products.
4. Databases used in the development or implementation of the OnDemand products, including what algorithms or processes are or were used in the creation of such databases.
5. How Targus translates ZIP+4 to V-H coordinates.
6. What algorithms or processes are or were used in the development and implementation of the ZIP+4 to V-H coordinate table used in conjunction with the OnDemand products.
7. What algorithms or processes are or were used by Targus in assigning V-H coordinates to the geographic location of callers.
8. What algorithms or processes are or were used by Targus in associating client locations with V-H coordinates.
9. What information is provided to Targus customers who receive OnDemand LocationID.

10. The project and development history of the OnDemand products, including systems and algorithms used in the development or implementation of the OnDemand products.

11. Network design for OnDemand products.

12. System testing for the implementation of OnDemand products including but not limited to: system test plans, system test procedures, system test results, and regression testing requirements and results.